

**IN THE UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF OKLAHOMA**

JONATHAN RIVERA-PIEROLA,

Plaintiff,

v.

BOARD OF REGENTS FOR THE
OKLAHOMA AGRICULTURAL AND
MECHANICAL COLLEGES; STATE OF
OKLAHOMA *ex rel.* OKLAHOMA
STATE UNIVERSITY; and ST.
MATTHEWS UNIVERSITY, INC.,

Defendants.

Civil Action No.: 5:21-cv-00616-PRW

**PLAINTIFF'S UNOPPOSED MOTION FOR LEAVE FOR LEAD
COUNSEL TO APPEAR BY TELEPHONE FOR STATUS AND SCHEDULING
CONFERENCE SET FOR AUGUST 2, 2022**

In the event a Scheduling Order is not entered prior to the Status and Scheduling Conference scheduled for August 2, 2022, at 9:30 a.m. and the conference is not deemed stricken, Plaintiff respectfully requests leave pursuant to LCvR 16.1(b)(4) for his lead counsel to appear by telephone at the Status and Scheduling Conference. In support thereof, Plaintiff states as follows:

1. Plaintiff's lead attorneys, Jason J. Bach, will be in Boston, Massachusetts on August 2, 2022.
2. Plaintiff's local counsel, Jack Freeman, will personally appear at the conference in the event a Scheduling Order is not entered prior to the Status and

Scheduling Conference scheduled for August 2, 2022, at 9:30 a.m. and the conference is not deemed stricken.

3. Plaintiff respectfully requests that leave be granted to allow his lead counsel to appear telephonically in an effort to conserve resources.

4. The undersigned contacted Defendants' counsel, Clinton Pratt, Counsel for Board of Regents for Oklahoma Agricultural and Mechanical Colleges and the State of Oklahoma ex rel. Oklahoma State University ("OSU") who has no objection to the filing of this motion or to Plaintiff's lead counsel appearing at the Status and Scheduling by telephone if the conference is not deemed stricken.

WHEREFORE, Plaintiff respectfully requests an Order allowing his lead counsel, Jason J. Bach, to appear by telephone at the Status and Scheduling to be held on August 2, 2022, if the conference is not deemed stricken.

Respectfully submitted this 12th day of July, 2022.

THE BACH LAW FIRM, LLC

/s/ Jason J. Bach
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Attorneys for Plaintiff Jonathan Rivera-Pierola

CERTIFICATE OF SERVICE

I hereby certify that on July 12, 2022, I electronically transmitted the foregoing document to the Clerk of the Court using the ECF System for filing and transmittal of a Notice of Electronic Filing to the following ECF registrants:

Clinton W. Pratt
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Gaylan Towle, II
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/s/ Jason J. Bach

Jason J. Bach, Esq.